

AUSA: Longsworth

Telephone: 810.766.5177

AO 91 (Rev. 08/09) Criminal Complaint

Special Agent: McDonald

Telephone: 810.239.5775

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.

Ronald Thomas Morgan

Case: 4:19-mj-30460

Judge: Davis, Stephanie Dawkins

Filed: 08-29-2019

CMP USA v RONALD THOMAS MORGAN (TH)

Defendant(s).

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of August 12, 2019 and August 29, 2019, in the county of Genesee
in the Eastern District of Michigan, the defendant(s) violated:

Code Section

18, U.S.C. Section 2113(a)
18, U.S.C. Section 922(g)(1)

Offense Description

Bank Robbery
Felon in Possession of a Firearm

This criminal complaint is based on these facts:

On or about August 12, 2019, in the Eastern District of Michigan, defendant committed bank robbery, in violation of 18, U.S.C. Section 2113(a).

On or about August 29, 2019, in the Eastern District of Michigan, defendant having been previously convicted of a crime punishable by a term of imprisonment exceeding one year, knowingly possessed a firearm that was shipped and transported in interstate commerce and foreign commerce, in violation of 18 U.S.C. Section 922(g)(1).



Continued on the attached sheet.


*Complainant's signature*Robert McDonald, Special Agent-FBI*Printed name and title*

Sworn to before me and signed in my presence.

Date: August 29, 2019City and state: Flint, Michigan
*Judge's signature*Stephanie Dawkins Davis, U.S. Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF
COMPLAINT**

I, Special Agent Robert McDonald, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation, and have been since October 2004. I have received training, and been involved with, investigations of numerous types of criminal matters, including, but not limited to, robberies of financial institutions, gang/criminal enterprise investigations, financial crime investigations, and investigations involving the trafficking of firearms and controlled substances.
2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.
3. Based on my training and experience and the facts set forth in this affidavit, I believe that there is probable cause to believe that RONALD THOMAS MORGAN committed bank robbery, in violation of 18 U.S.C. § 2113(a); and felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1).

BACKGROUND

4. On Monday August 12, 2019, around 12:05 pm, the Clio Police Department, Clio, Michigan, received a report of an armed robbery at the PNC Bank, which is located at 107 East Vienna Street in Clio, within the Eastern District of Michigan.
5. Responding law enforcement officers conducted interviews of witnesses at the PNC Bank and obtained information that the armed robbery suspect was a black male with gray and black facial hair, wearing a hooded sweatshirt, blue jeans, a baseball hat, sunglasses, and shoes with white soles. Some witnesses described the suspect as in his late 50s or 60s. PNC surveillance footage shows the suspect inside of the bank. The suspect's sweatshirt has the words "Smashing Bass" written across the back above a logo.
6. A PNC Bank teller who was working in teller window #1 advised that the suspect walked in very calmly and approached her teller window. The suspect requested money and the teller asked the suspect if he wanted a withdrawal. The suspect replied that he wanted a withdrawal and he lifted his sweatshirt to expose a large, black and silver handgun tucked into his waistband. The teller in turn provided the suspect with United States currency, and the suspect exited out the north side of the bank. The suspect did not identify any bank account number nor attempt to make a legitimate withdrawal of money.

7. PNC Bank audited the currency at teller window #1 and determined that the suspect took \$2,298.00 in United States Currency after he exposed the firearm in his waistband to the teller.
8. PNC Bank is a Federal Deposit Insurance Corporation insured institution.
9. PNC Bank provided surveillance photographs of the suspect that I have reviewed during this investigation.
10. After the robbery, a Crime Stoppers tip request was released to the public, which included a description of the suspect and photographs of the suspect inside the bank.
11. On August 19, 2019, the Clio Police Department received an anonymous tip from a person who advised that the photographs of the suspect in the Crime Stoppers tip request resembled RONALD MORGAN. The caller disclosed that he or she used to work closely with RONALD MORGAN and became very familiar with him. The caller explained that the hooded sweatshirt worn by the suspect is similar to a hooded sweatshirt belonging to another co-worker who worked with both the caller and RONALD MORGAN. The hooded sweatshirt was created for a fishing team called "Smashing Bass" and the co-worker left it in one of the company trucks when he quit. RONALD MORGAN was still employed by the company when the co-worker abandoned the hooded sweatshirt. The caller stated that RONALD MORGAN resides at XXXX Whitney Avenue, Flint, Michigan. The caller added

that employees of the company recently told the caller that RONALD MORGAN was fired from the company.

12. I corroborated that RONALD MORGAN resides at XXXX Whitney Avenue, Flint, Michigan, through several means, including driver's license information and utility records. The PNC bank on Vienna Street in Clio is about 15 miles from RONALD MORGAN's house on Whitney Avenue.
13. On August 19, 2019, Crime Stoppers received an anonymous tip stating that the sweater worn by the suspect in the photographs was stolen from a work truck, and that only four of those sweaters were ever manufactured, as they were custom made for a fishing tournament. The tipster identified the suspect as being RONALD MORGAN.
14. On August 29, 2019, a team of FBI agents executed a search warrant at XXXX Whitney Avenue, Flint, Michigan. Agents encountered RONALD MORGAN and his wife inside the house. Before searching, an agent asked RONALD MORGAN whether there were any dangerous items or firearms in the house. RONALD MORGAN said that there was a shotgun in his son's bedroom, and his son was away at college.
15. FBI agents found a Remington, Model 870, 20-gauge shotgun leaning up against a wall in plain view in a bedroom on the main level of the house. RONALD MORGAN and his wife identified this bedroom as their son's bedroom. FBI agents

found several live, 20-gauge shotgun shells in the master bedroom, which RONALD MORGAN and his wife identified as their bedroom.

16. FBI agents found sunglasses in a purse in the master bedroom that match the sunglasses worn by the suspect as shown on the bank's video recording of the robbery. Agents also found a pair of shoes in the living room that match the shoes worn by the suspect as shown on the bank's video recording of the robbery.
17. I showed RONALD MORGAN's wife a photograph of the suspect taken from the bank's video surveillance system. She informed me that the suspect looks like RONALD MORGAN. She also told me that the sunglasses worn by the suspect in the photograph appear to be same ones she had in her purse.
18. On May 26, 1998, RONALD MORGAN pleaded guilty to seven counts of bank robbery by force or violence in the Eastern District of Missouri in case 4:98-cr-00118-CAS-1. These federal offenses were punishable by more than one year in prison. On August 14, 1998, the district court sentenced RONALD MORGAN to 78 months in prison for these offenses. Because RONALD MORGAN pleaded guilty to these offenses and actually served more than one year in prison, I believe there is probable cause that he knew he had been convicted of an offense that was punishable by more than one year in prison when he possessed the Remington 20-gauge shotgun on August 29, 2019.

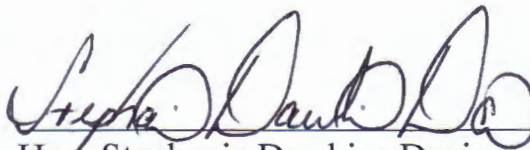
19. On August 29, 2019, I spoke with ATF firearms expert Jonathan Wickwire about the Remington, Model 870, 20-gauge shotgun. He informed me that this shotgun was manufactured outside of Michigan and therefore traveled through interstate commerce before RONALD MORGAN possessed it.
20. I, Special Agent Robert McDonald, Federal Bureau of Investigation, being duly sworn according to law, hereby state that the facts stated in the foregoing affidavit are true and correct to the best of my knowledge, information and belief.

Dated the 29th day of August 2019, at Flint, Michigan.



Robert McDonald
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 29th day of August, 2019.



Hon. Stephanie Dawkins Davis
United States Magistrate Judge